

Public consultation report

September 2025

Updating the Guidelines for the 5+1 internship program

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Australian Health Practitioner Regulation Agency
National Boards

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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.

Background

1. The Psychology Board of Australia (the Board) recently consulted on updating the [guidelines for the 5+1 internship program](#) (the 5+1 guidelines).
2. The purpose of the 5+1 guidelines is to:
 - a. outline the requirements of the 5+1 internship program (the internship program) including describing the aims, entry requirements and completion pathway for the internship
 - b. guide provisional psychologists and their supervisors through the internship program by detailing the standards and responsibilities of the supervisory arrangement.
3. We regularly review our standards, guidelines and policies for relevance and effectiveness. The 5+1 guidelines were issued in 2013 and have not undergone a major review since. While we generally review guidelines every five years, the Board decided to wait for the last cohort of the 4+2 internship program to begin (see: [Retirement of the 4+2 internship program](#)) and for the threshold professional competencies to be updated (see: [Professional competencies for psychologists](#)).
4. The Board's preferred option at consultation was to conduct a full review of the internship requirements and administrative rules to:
 - a. ensure the guidelines align with contemporary psychology practice by including the recently updated [Professional competencies for psychologists](#) into the internship program
 - b. better align the internship program requirements with the contemporary regulatory context
 - c. reduce the regulatory burden and complexity of the internship program
 - d. update the language and structure of the guidelines to improve readability.
5. We carried out a preliminary consultation with psychology-specific stakeholder organisations and government departments in early 2025. Public consultation was open between 7 May and 2 July 2025. The proposed 5+1 guidelines and consultation paper providing background to the proposal can be found at our [past consultations](#) page.
6. We have carefully considered all feedback. We would like to thank all individuals, organisations, professional associations and the community for their valuable feedback and engagement with this review.

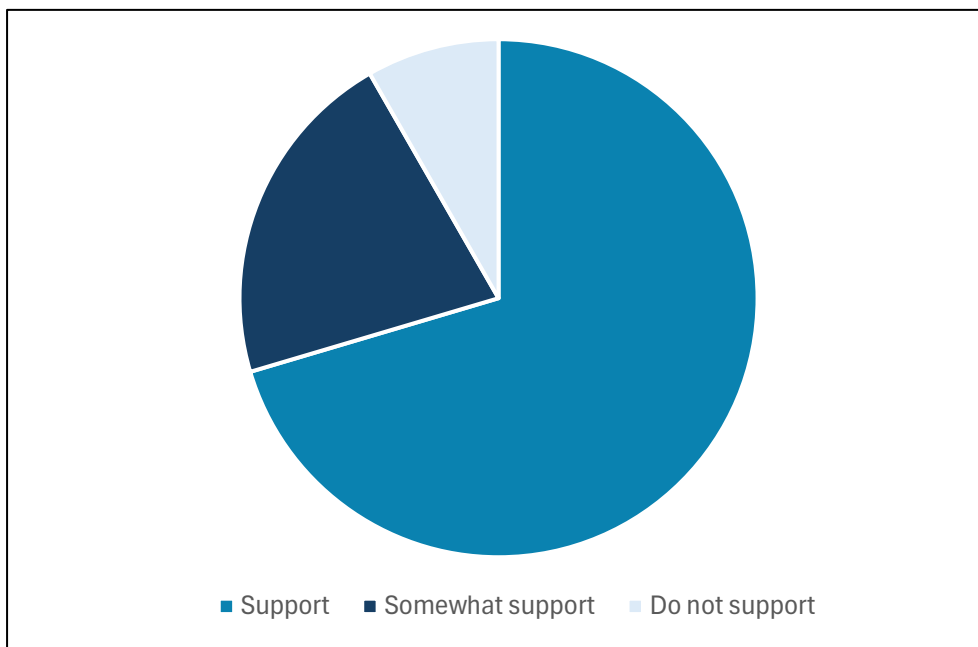
Submissions

7. The Board sought feedback on ten specific questions ([Public consultation paper](#), page 13).
8. 169 submissions were received during public consultation:
 - a. 19 stakeholders submitted *detailed feedback* by completing the submission template (word document) provided by the Board,
 - b. 150 people submitted *brief feedback* via a shortened version of questions through an online survey (Qualtrics). All online survey submissions were from individuals.
9. Submissions approved for publication can be reviewed [here](#). Submissions that were received at preliminary consultation or that were requested to be kept confidential are not published.

Feedback from public consultation

Preferred option

10. Stakeholders were asked if they supported updating the 5+1 guidelines, as per the Board's preferred option.

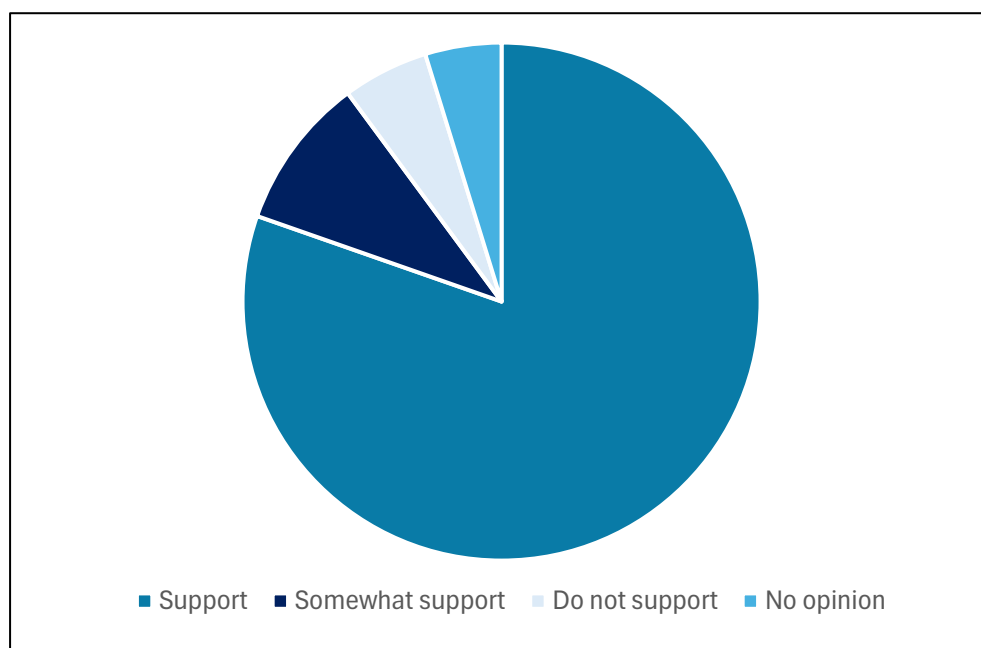


11. A clear majority of stakeholders (119 responses) supported the Board's preferred option of updating the 5+1 guidelines.

12. 36 stakeholders partially or somewhat supported updating the guidelines, while raising concerns about some of the recommended changes. These concerns are discussed below. 14 stakeholders who submitted the online survey did not support updating the guidelines however reasons were not provided.

Incorporating the updated competencies into the 5+1 internship

13. Stakeholders were asked whether they supported including the updated [professional competencies for psychologists](#) into the 5+1 guidelines.



14. There was strong support for the inclusion of the updated competencies.

15. 135 stakeholders were in support, nine did not support, while the remainder either had either expressed partial support or no opinion

Changes to 5+1 internship requirements

Education and training activity hours

16. Feedback from multiple stakeholders highlighted concern regarding the absence of minimum hours for education and training activities.

17. The main reason for this concern was that without a minimum requirement, this type of training may be applied inconsistently and could affect the level of competency achieved by provisional psychologists.
18. While having no mandated minimum hours aimed to align the guidelines with contemporary training methods (developing competence instead of completing a set number of hours), there was strong feedback against this proposal.
19. Recognising this concern, we have kept the requirement to complete a minimum of 60 hours of education and training activities as per the 2013 guidelines.

Progress reviews

20. Under the current guidelines, progress reports must be completed every six months by the supervisor and provisional psychologist, and submitted to the Board. We proposed removing both the fixed timeframe for these reports and the requirements to submit them to the Board.
 - a. The removal of a timeframe associated with progress reviews was to allow for more flexibility in timing and the number of reviews completed, recognising that individual learning needs of provisional psychologists vary.
 - b. Removing the submission of these reviews to Ahpra intended to reduce the regulatory burden of the internship, in circumstances where a Board-approved Supervisor is well positioned to provide oversight on progress.
21. Consultation feedback referred to the additional burden on supervisors to determine frequency of reviews, potential loss of accountability for supervisors and provisional psychologists, and loss of a mechanism for concerns to be raised to the Board.
22. Having considered this feedback, we decided to keep the requirement that progress reviews be conducted at least every six months during the internship, noting that:
 - a. Supervisors can choose to conduct reviews more frequently as part of the usual supervision process if they wish to do so
 - b. Supervisors will determine the format of these reviews. The Board will publish an example template that may be used but is not mandatory.
 - c. Supervisors have other mechanisms for escalating concerns about a provisional psychologist's performance (e.g. notification, ending supervisory relationship if a provisional psychologist is not complying with requirements)
 - d. These reviews do not need to be submitted to the Board, unless requested.

Direct observation timeframes

23. The 2013 guidelines required supervisors to directly observe the provisional psychologist undertake four sessions every six months.
24. At public consultation our proposed guidelines slightly altered this requirement. The proposal was that the supervisor was to observe eight sessions in total (minimum four assessment and four intervention) and the wording around six-monthly observation had been removed.
25. Stakeholder feedback included concern that for those completing their internship part-time, or those who take significant breaks, there was no longer a requirement for ongoing direct observations for the entirety of their internship.
26. We have therefore kept a timeframe for direct observation, with two assessment and two intervention sessions observed every six months of the internship.

Case studies

27. The current 5+1 guidelines require two case studies from a pool of four developed during the internship to be submitted to Ahpra. We proposed removing case studies entirely from the 5+1 internship program.

28. A number of stakeholders opposed this removal. Their reasons included that case studies:

- a. develop formulation, diagnosis, intervention and treatment skills
- b. are an essential component of effective training and competency development
- c. protect public safety by upholding standards of practice.

29. There was also strong support from stakeholders to remove the case study requirements with many submissions highlighting:

- a. their ineffectiveness in skill development
- b. the burden associated with case reports
- c. the potential delay on approval for general registration, given the time required from both supervisors and Ahpra to review the case studies

30. The Board has carefully reviewed these responses and decided case studies will no longer be required for the 5+1 internship program for the following reasons:

- a. Case studies are a report about practice the provisional psychologist has already completed under supervision. If there were concerns about how the provisional psychologist managed a particular case, this would have been raised by the supervisor at the time. Case studies therefore do not enhance public safety, as they are a reflection on actions already undertaken.
- b. Throughout the internship, supervisors must observe provisional psychologists conducting assessment and intervention sessions, which will help to develop their assessment and writing skills.
- c. Supervisors can choose to have provisional psychologists complete a case study as part of their education and training activities, but mandating the completion of case studies, and their submission to Ahpra, does not result in quality improvement to practice or increased public safety. While they may be useful for supervisors in evaluating progress towards competence, case studies are no longer required to evaluate regulatory risk.
- d. The case studies are unique to the internship and are not necessarily reflective of documentation produced during psychological practice. For example, psychologists with general registration are more likely to complete written assessments in the form of referrals, court reports and client records.
- e. In line with the [National Scheme's regulatory principles](#), the time and cost required to assess case studies is not proportionate to the level of risk posed. This cohort of provisional psychologists undertake a placement during completion of their fifth-year of study and have met the competencies of advanced knowledge and skills for professional practice. Removing the requirement to submit case studies to Ahpra reduces the regulatory burden associated with their assessment and feedback.

Internship plan approval and commencing direct client contact

31. There was some feedback that submitting [internship plans](#) (INPP-76) to Ahpra and waiting for approval can result in significant delays. Currently provisional psychologists can only undertake simulated client contact and education activities while they await approval, and are not permitted to begin direct client contact.

32. We will now allow provisional psychologists to commence direct client contact once their initial internship plan is agreed, and signed by both themselves and their principal and secondary supervisors. The plan will still need to be submitted to Ahpra for approval.

33. We have made this decision for the following reasons:

- a. The level of risk associated with 5+1 provisional psychologists commencing direct client contact is considered low. This is because the fifth year of the 5+1 pathway includes

formal practical training that ensures competence in assessment, diagnosis, and the delivery of psychological interventions prior to the internship year.

- b. Provisional psychologists have already completed 300 hours of placement during their fifth year at university, before commencing the 5+1 internship.
- c. The option for earlier direct client contact prior to Ahpra's approval of the internship plan is not mandated. Ultimately, the decision for when a provisional psychologist begins direct client work rests with the supervisor.
- d. Commencing direct client contact prior to Ahpra review of the plan is not considered to change the level of risk to the public, as provisional psychologists must always practice under supervision and the supervisory relationship has been established.

Content of the draft 5+1 guidelines

- 34. Those completing detailed feedback were asked if the language, structure and wording of the 5+1 guidelines was clear and workable.
- 35. Stakeholders found the structure and wording of the guidelines helpful, clear, more streamlined and relevant.

Out of scope feedback

- 36. Many individual stakeholders took the opportunity to respond to the final question 'Do you have any other feedback or comments about the draft 5+1 guidelines?'
- 37. While the Board appreciates the time stakeholders took to provide us with this information, much of this feedback was out of scope (e.g. requests to remove the national psychology exam, feedback regarding the training pathway for psychologists). This consultation was specific to the 5+1 guidelines which set out the core requirements for the one-year internship component of the 5+1 pathway.
- 38. This feedback has been recorded and will be considered in future work undertaken by the Board. Where appropriate, feedback has also been provided to relevant Ahpra departments for consideration.

How we used your feedback

- 39. Below is a summary of how we used the feedback received during the consultation process.

Themes	How we used your feedback
Updating internship requirements	Due to stakeholder feedback, we have: • retained minimum 60 hours for education and training activities • retained six-monthly timeframe for progress reviews • retained six-monthly timeframe for direct observation • removed the requirement to submit logbooks to Ahpra, unless requested • removed the requirement to submit progress reviews to Ahpra, unless requested • removed case studies as an internship requirement • removed the rule that internship plans must be approved by Ahpra before provisional psychologists can begin direct client contact
Implementation	The intended date of effect of 1 December 2025 was supported by most stakeholders. An advance copy of the 5+1 guidelines will be published three months prior to the date of effect.

	We will also include evaluation processes as a post-implementation task, to ensure the updated guidelines are working as intended.
Supporting documents	To accompany the new guidelines, the Board intends publish a suite of fact sheets with additional supporting information. This will include: • how to set up a good supervisory relationship • dispute resolution • notifications during the internship We will also provide information to support the transition to the new guidelines in the form of Frequency Asked Questions, particularly for those due to complete their internship prior to the 1 December 2025.

Next Steps

40. An advance copy of the guidelines for the 5+1 internship program has been published to the Board's [website](#) ahead of the date of effect of 1 December 2025.
41. The Board and Ahpra will regularly monitor and review the 5+1 guidelines to ensure they remain relevant, contemporary and effective.